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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO WESTERN DIVISION

DREWES FARMS PARTNERSHIP,

Civil Action No. 3:19-cv-00434

Plaintiff,

Judge Jack Zouhary

and

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STATE OF OHIO,

Magistrate Judge James R. Knepp, II

Intervenor,

:

v.

:

THE CITY OF TOLEDO, OHIO,

:

Defendant.

PLAINTIFF DREWES FARMS PARTNERSHIP'S MOTION FOR ATTORNEYS' FEES AND COSTS

In accordance with Fed. R. Civ. P. 54(d)(1) and (2), Plaintiff Drewes Farms Partnership ("Drewes Farms"), hereby moves for an award of attorneys' fees and costs pursuant to 42 U.S.C. § 1988. On February 27, 2020, the Court issued an Order, granting Drewes Farms's motion for judgment on the pleadings and invalidating the Lake Erie Bill of Rights. That same day, the Court entered final judgment in this matter. As the prevailing party, Drewes Farms is entitled to attorneys' fees and costs under 42 U.S.C. § 1988 and 24 U.S.C. § 1920. Drewes Farms seeks a total of \$293,752.00 in attorneys' fees and \$532.50 in costs. A memorandum in support is attached.

Respectfully submitted,

VORYS, SATER, SEYMOUR AND PEASE LLP

s/ Thomas H. Fusonie

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Counsel for Plaintiff Drewes Farms Partnership

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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing was served electronically through this Court's electronic service system upon all parties and/or counsel of record on this 12th day of March, 2020. Notice of this filing is sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's system.

s/Thomas H. Fusonie

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